

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

BRUCE GARELICK,
MICHAEL SHVARTSMAN, and
GERALD SHVARTSMAN,

Defendants.
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Civil Action
No. 23-cv-5567 (PGG)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Complaint in the above-captioned action; the Indictment in the criminal case *United States v. Shvartsman et al.*, 23 Cr. 307 (LJL) (the “Criminal Case”); and the accompanying memorandum of law, the United States of America, by its attorney, Damian Williams, United States Attorney for the Southern District of New York, and Nicolas Roos, Elizabeth A. Hanft, and Matthew R. Shahabian, Assistant United States Attorneys, will move this Court for an order (i) to intervene in the above-captioned case, pursuant to Rule 24 of the Federal Rules of Civil Procedure, and (ii) to stay this case in its entirety until the conclusion of the Criminal Case, as well as for such other relief as the Court deems just and proper.

Dated: New York, New York
September 1, 2023

Respectfully submitted,

DAMIAN WILLIAMS

United States Attorney

/s/

Nicolas Roos

Elizabeth A. Hanft

Matthew R. Shahabian

Assistant United States Attorneys

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